

REMARKS

Claims 1-42 were presented for examination and were pending in this application. In an Official Action dated June 24, 2004, claims 1-41 were rejected. Applicants thank the Examiner for examination of the claims pending in this application and address the Examiner's comments below.

Based on the above Amendment and the following Remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections, and withdraw them.

Response to Rejection Under 35 USC 102(b)

In the second through fourth paragraphs of the Office Action, the Examiner rejects claims 1, 2, 16, 32, 39, 40, and 41 under 35 USC § 102(b) as allegedly being anticipated by U.S. Patent No. 6,067,548 ("Cheng '548"). This rejection is respectfully traversed.

As a preliminary matter, Cheng '548 is not available as § 102(b) art. Cheng '548 issued May 23, 2000 and the pending application was filed January 26, 2001 and has a priority date of January 26, 2000. The difference between the priority date and the filing date of Cheng '548 is less than one year and thus Cheng '548 does not qualify as a § 102(b) reference. Thus, Applicants respectfully request that the Examiner withdraw this rejection. However, because Cheng '548 may be available as a § 102(e) reference, Applicants address the substance of the rejection below.

The grounds of rejection set forth by the Examiner with respect to § 102(b) appear directed entirely at the limitations of claims 1 and 2. There is no specific discussion of many of the features of the other rejected claims, independent claims 16, 32, 39, 40, and 41. For example,

the Examiner does not discuss a combined presentation of status information and updated information as recited in claims 16 and 39. Because of the many distinct features of these claims, the Examiner's omnibus rejection is improper. See MPEP § 707.07(d) ("A plurality of claims should never be grouped together in a common rejection, unless that rejection is equally applicable to all claims in the group.") For this reason the Examiner is respectfully requested to withdraw the rejection of claims 16, 32, 39, 40, and 41.

Claims 1, 40, and 41 as amended recite a computer-implemented method for managing tasks and a computer program product for deriving services and tracking completion of tasks, comprising accessing a server; determining whether the user is of a type authorized to execute the instruction; extracting status information; and providing or storing the status information.

These aspects of the claimed invention provide for task management by various types of users and allows control over the tasks that each user is authorized to execute. (See, e.g., Fig. 32 and accompanying text.) This advantageously provides non-managers easy access to their tasks, and provides managers transparent tracking and more efficient management of workflow.

These aspects of the claimed invention are not disclosed or suggested by Cheng '548, which is presently understood to disclose a tool to model an enterprise for collaborative computing generally, but does not disclose or suggest at least determining whether a user is of a type authorized to execute the instruction.

It is therefore respectfully submitted that claims 1, 40, and 41 are patentably distinguishable over the cited art.

Dependent claims 2-5, 7-15 depend from independent claim 1, which was shown above to be patentable over Cheng '548. In addition, claims 3-5, 7-15 are further limited from claim 1 by specific recitations not disclosed or suggested by Cheng '548 as correctly noted by the

Examiner in his discussion of claims rejected under § 103. Claim 6 has been canceled. It is therefore respectfully submitted that these dependent claims, specifically claims 2-5, 7-15, are patentably distinguishable over the cited art for at least this additional reason.

Claims 16 and 39 recite a method for integrating status information and a system for tracking status information, respectively, comprising accessing an account in response to an instruction received from a user; receiving the status information associated with the account from a database; receiving the updated information for modifying the status information from the user; and forming a combined presentation of the status information modified by the updated information, wherein the combined presentation includes a representation of the status information received from the database and a representation of the updated information.

These aspects of the claimed invention provide for an integrated display of status information and updates thereto. (See, e.g., Fig. 12 and accompanying text.) This is advantageous because it allows authorized users to see not only status information for tasks, but also very granular details regarding the progress of tasks toward completion.

These aspects of the claimed invention are not disclosed or suggested by Cheng '548. Applicants note that several elements of claims 16 and 39, including these aspects, were not addressed by the Examiner in the office action. Cheng '548 is presently understood to disclose a tool to model an enterprise for collaborative computing generally, but Applicants could not find disclosure or suggestion in Cheng '548 of at least a combined presentation with a representation of the status information and updated information.

It is therefore respectfully submitted that claims 16 and 39 are patentably distinguishable over the cited art.

Dependent claims 17-31 depend from independent claim 16, which was shown above to be patentable over Cheng '548. In addition, claims 17-31 are further limited from claim 16 by specific recitations not disclosed or suggested by Cheng '548 as correctly noted by the Examiner in his discussion of claims rejected under § 103. It is therefore respectfully submitted that these dependent claims, specifically claims 17-31, are patentably distinguishable over the cited art for at least this additional reason.

Claim 32 recites a method for tracking work flow information, comprising accessing an account on a server from a client by one of a plurality of users; displaying the work flow information in response to accessing the account according to the position of the one of a plurality of users; modifying the information with updates; and storing the information modified to the database.

These aspects of the claimed invention provide for task management by various types of users according to the position of the user. (See, e.g., Fig. 32 and accompanying text.) This advantageously provides non-managers easy access to their tasks, and provides managers transparent tracking and more efficient management of workflow. These aspects of the claimed invention are especially helpful for use with large projects involving several distinct categories within the project. (See, e.g., Fig. 26 and accompanying text.)

These aspects of the claimed invention are not disclosed or suggested by Cheng '548, which is presently understood to disclose a tool to model an enterprise for collaborative computing generally, but does not disclose or suggest at least determining whether a user is of a position authorized to execute the instruction.

It is therefore respectfully submitted that claim 32 is patentably distinguishable over the cited art.

Dependent claims 33-38 depend from independent claim 32, which was shown above to be patentable over Cheng '548. In addition, claims 33-38 are further limited from claim 32 by specific recitations not disclosed or suggested by Cheng '548 as correctly noted by the Examiner in his discussion of claims rejected under § 103. It is therefore respectfully submitted that these dependent claims, specifically claims 33-38, are patentably distinguishable over the cited art for at least this additional reason.

In summary, the claimed invention provides more efficient and effective task management by controlling access over the tasks that each user is authorized to execute by user type for more transparent tracking and management of workflow. The claimed invention also provides a combined presentation integrating status information and updates, providing very granular details of the progress of tasks toward completion. These aspects of the claimed invention are especially helpful for use with large projects involving several distinct categories within the project.

Response to Rejection Under 35 USC 103(a)

In the fifth through thirty-fourth paragraphs of the Office Action, the Examiner rejects claims 3-15, 17-31, and 33-38 under 35 USC § 103(a) as allegedly being unpatentable over U.S. Patent No. Cheng '548 and U.S. Patent No. 6,026,365 ("Hayashi '365"). This rejection is respectfully traversed.

Claims 3-5, 7-15, 17-31, and 33-38 are further limited from claims 1, 16, and 32, respectively, as discussed above. Claim 6 has been cancelled.

These aspects of the claimed invention are not disclosed or suggested by any of the cited references considered alone or in the combination proposed by the Examiner. As discussed above Cheng '548 lacks at least determining whether a user is of a type or position authorized to

execute the instruction and a combined presentation with a representation of the status information and updated information.

The Hayashi '365 reference does not remedy the deficiencies of the Cheng '548 reference. Hayashi '365, as presently understood, merely discloses a basic workflow support system, but does not disclose or suggest at least the limitations of the independent claims as discussed above.

For example, as presently understood Hayashi '365 discloses a shared environment requiring a basic sign-on (see, e.g., Fig. 1 and accompanying text, col. 5, l. 62-col. 6, l. 1), but does not disclose controlling access over the tasks that each user is authorized to execute by user type within the shared environment. In addition, as presently understood Hayashi '365 discloses a task sheet (see, e.g., Fig. 6) that allows for generic status states such as "waiting for execution, executing, and complete" (see, e.g., col. 6, ll. 17-18), but does not provide for specific updates to the status information. (See, e.g., Fig. 12 and accompanying text.)

The deficient disclosures of these references, considered either alone or in combination, thus fail to establish even a *prima facie* basis from which a proper determination of obviousness under 35 U.S.C. § 103(a) can be made. A *prima facie* showing of obviousness requires (1) some suggestion or motivation to modify the reference, (2) a reasonable expectation of success, and (3) that the reference(s) teach or suggest all the claim limitations. Applicants submit that they can find no suggestion or motivation to modify or combine the references in the manner suggested by the Examiner. It is irrelevant that it would have been obvious to try (see office action, page 4, para. 5); the legal standard is that it must have been obvious to do. There also must be a reasonable expectation of success. Here, it is asserted that no such reasonable expectation of success exists. Thus, the suggested, albeit deficient, combination could only be derived from the

Examiner's hindsight reconstruction of these elements using instructions found only in Applicants' own specification.

In addition, with respect to claims 10, 22, 23, and 31, the Examiner correctly notes that neither Cheng '548 nor Hayashi '365, separately or in the combination suggested by the Examiner, recite all the limitations of claims 10, 22, 23, and 31, respectively. Specifically, on page 14 the Examiner states that Cheng and Hayashi do not recite "associating access permission with the parameter by an administrator" and "receiving a user identification number and a password from the instruction, accessing the database to authenticate the user identification number and the password, and responsive to the user identification number and the password being authenticated, enabling access to the account, and generating an error message for display on the client computer responsive to the user identification number and the password being unauthenticated." Thus, the references do not teach or suggest all the claim limitations. Thus, none of the three components required to establish a *prima facie* basis have been met.

Based on the above Amendment and Remarks, Applicants respectfully submit that for at least these reasons claims 1-5 and 7-41 are patentably distinguishable over the cited references, both alone and in combination for at least this additional reason. Therefore, Applicants respectfully request that the Examiner reconsider the rejection, and withdraw it.

Conclusion

In view of the foregoing arguments, Applicants respectfully submit that the claims presently in this case are now in condition for allowance. Reconsideration and prompt favorable action are therefore solicited.

In addition, Applicants respectfully invite the Examiner to contact Applicants' representative at the number provided below if the Examiner believes it will help expedite furtherance of this application.

Respectfully submitted,
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